



**FLUOR DANIEL**

**INTEROFFICE CORRESPONDENCE**

# 2  
BFI - Chem. Serv. Dallas  
TXD 064131139

PROJ. # 06639652-18

FILE R.O. S.

HEADING Site Summary

To:	Mengistu Lemma	Date:	August 30, 1995
Location:	Dallas	Reference:	06639652-100
From:	Terry Smart		
Location:	Irvine	Client:	EPA SIP
Extension:	6344	Subject:	Site Summary

cc: Brice Babbitt

This memorandum serves to document the history of the BFI-Chemical Services site which was scheduled for a category 2 scoring under the current SIP assignments.

1980: In March of 1980, a Potential Hazardous Waste Site Identification and Preliminary Assessment was prepared for BFI of Texas at 2617 Willowbrook Road. The site was identified from a "hazardous waste master log". Mr Wendall Thomas, the facility manager, was contacted; this company never handled any hazardous waste, liquid waste or sludges. This location was used as a solid waste collection operation, with all waste being sent to City of Dallas landfills.

In November, 1980, BFI Chemical Services located at 2617 Willowbrook Road submitted RCRA permit application documents, Forms 1 and 3, to the U.S. EPA. The treatment processes identified were incineration (20 gallons per hour) and waste storage in tanks and drums (75,000 gallons and 11,000 gallons respectively). The hazardous waste identification number of the Willowbrook Road as listed on the permit application forms was TXD064131139. An area map for the facility shows the location on Willowbrook Road. The facility location is requested and differentiated from the mailing address in the permit application. Both addresses are listed as 2617 Willowbrook Road. A photograph labeled "proposed Tank Farm location" and a site plan, which appears to be the Willowbrook Road location showing the proposed tank farm location were included in the permit application. It is not possible to determine if an incinerator is included on this site plan. No further mention of an incinerator appears in the file information.

The permit application stated that BFI Chemical Services provided:

- 1) marketing, blending and delivery of specialty detergents, solvents, and additives,
- 2) collection and transportation of liquid, semi-solid, and solid bulk





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and drummed wastes, and 3) segregation and storage of liquid, semi-solid, and solid bulk and drummed wastes prior to shipment to properly permitted facilities for ultimate disposal.

1982: An unsigned, unsworn affidavit from George Young, Vice President of BFI Chemical Services, dated October 1982, notified the State of Texas that no hazardous waste is processed, stored or disposed on-site at 2617 Willowbrook Road, registration number TXD 064131139, and that no permit was needed. There is no indication that this affidavit was ever submitted to the State of Texas.

1984: In January, 1984 a second Potential Hazardous Waste Site Identification and Preliminary Assessment was prepared. Two photographs from outside the site are included. It appears that no entry onto the site was made. The information used to prepare the preliminary assessment was taken from the site's 1980 hazardous waste permit application discussed above. The reviewer noted that the State was not sure the tank farm had ever been constructed. No mention is made of an incinerator.

In February of 1984, a sworn affidavit, signed by Steven Thomas, VP of BFI Chemical Services certified that no hazardous waste was stored, processed or disposed at the site on Willowbrook. This affidavit was submitted to the Texas Department of Water Resources, and in July of 1984 the Texas Department of Water Resources withdrew the hazardous waste permit application.

In May of 1984, a Site Inspection Report was prepared. This inspection included a site visit conducted May 10, 1984. The inspector met with Jerry Martin, District Manager, BFI. The inspection concluded that no hazardous waste activity was being conducted at this site. However, a second site, located at 1101 Quaker Street in Dallas was mentioned in the inspection report as possibly being the site where hazardous waste activity was conducted. The inspector noted that the tank farm at the Willowbrook Road site was never constructed. This would presumably include the incinerator mentioned in the 1980 permit application as well. The inspector concluded that "the hazardous waste information on the preliminary assessment refers to the Chemical Services site". I do not believe that this is correct as far as waste quantities are concerned because the referenced waste information is from the 1980 hazardous waste permit application, which clearly shows the Willowbrook street



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site as the location of the proposed tank farm and the waste inventories appear to be the anticipated waste volumes which would have been handled if the tank farm and incinerator had been constructed.

In October of 1984 a Final Strategy Determination was prepared by EPA which concluded that the Willowbrook Road site did not conduct any hazardous waste activity, and that the Quaker Street site would be referred to RCRA enforcement because there was no RCRA listing for 1101 Quaker Street.

The EPA file contains no information that clearly documents the existence of the Quaker Street site. In August, 1995, Bobby Williams with EPA's RCRA Enforcement was contacted about the Quaker Street Site. He has no record of the site.

1985 :     In March, 1985 the Quaker Street facility was sold to MainTech. According to BFI, Maintech was sold at a later date but no further details are known.

#### **SUMMARY:**

The BFI Chemical Services site located at 2617 Willowbrook did not treat, transport, store or dispose of hazardous wastes. This site was and is an administrative office for municipal and nonhazardous industrial waste.

IN 1980 BFI Chemical Services planned to construct a tank farm, drum storage area and possibly an incinerator at the Willowbrook Road site. This facility was never constructed and the hazardous waste notification and permit application were withdrawn. The withdrawal included a certification that the site conducted no hazardous waste operations.

The BFI Chemical Services facility located at 1101 Quaker Street may or may not have conducted hazardous waste activities. EPA's RCRA unit has no records pertaining to that site. Although this site was to be referred to RCRA enforcement in 1984, there appear to be no records which would indicate that any enforcement activity resulted in the issuance of a RCRA identification number.

No one from EPA or it's contractors has ever seen or visited the Quaker street site. Ownership has changed hands at least twice, from BFI to Maintech to an unknown entity. A title record search and windshield survey may give an indication of current



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site activity, site size, and history. This would depend on time and budget available, and the need to further investigate the situation.

#### **RECOMMENDATIONS:**

Complete a Letter Memorandum on the Willowbrook Road site so that EPA can close the file.